

ATTACHMENT B

AFFIDAVIT OF HOMELAND SECURITY INVESTIGATIONS
TASK FORCE OFFICER JOSEPH FLETCHER

I, Joseph Fletcher, being first duly sworn, do hereby depose and state the following:

1. I, Joseph M. Fletcher, am a Task Force Officer (TFO) with United States Immigration and Customs Enforcement (ICE) Office of Homeland Security Investigations (HSI), and have been a TFO with ICE/HSI in Springfield, Missouri, since January 2017. I have been employed in the field of law enforcement since March 2005, including duties as a deputy sheriff in Greene County, Missouri, and a criminal investigator for the Greene County, Missouri, Sheriff's Office. As part of my duties with ICE/HSI, I investigate criminal violations relating to child exploitation, child pornography, human trafficking, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2252(a), 2252A, and 2422(a) and (b). I have received training in the areas of child pornography, child exploitation, and human/sex trafficking. I have conducted operations relating to the exploitation of children and adults in Missouri and Kansas. I have investigated child abuse/exploitation cases for more than six years and have been a member of the Southwest Missouri Cyber Crimes Task Force (SWMCCCTF) for approximately three years.

2. This affidavit is in support of a criminal complaint charging Colby FRONTERHOUSE with sexual exploitation of a child, in violation of 18 U.S.C. § 2251(a) and § 2251(e).

3. The information contained in this affidavit is based upon my own investigation, oral and written reports by other law enforcement officers, and other investigative techniques. The dates and times in this affidavit are approximate. Because the purpose of this affidavit is

to set forth only those facts necessary to establish probable cause for this criminal complaint, I have not described all the relevant facts and circumstances of which I am aware.

4. On September 11, 2020, Christian County, Missouri, Deputy Devin Wagner contacted John Doe, then 13 years old, and John Doe's father. Deputy Wagner was advised that John Doe had been contacted by an unknown individual, claiming to be a 14 year old female, (the "suspect"), using the phone number (417) 228-0055 and that John Doe had transmitted text messages with this phone number for approximately one week. During the exchange of messages, the suspect convinced John Doe to transmit nude images of himself, in exchange for nude images of herself.

5. Christian County, Missouri, Sheriff's Office Detective Sarah Spurlock-Patterson downloaded the contents of John Doe's Apple iPhone 8. During the download of John Doe's cell phone, Detective Spurlock-Patterson discovered a text message thread exchanged between John Doe and the phone number (417) 228-0055. She located an image depicting an exposed penis in John Doe's phone's iCloud.

6. Detective Spurlock-Patterson used law enforcement resources to learn the suspect phone number (417) 228-0055 was registered to Bandwidth, LLC, but was maintained by Ad Hoc Labs. Detective Spurlock-Patterson issued an investigative subpoena to Ad Hoc Labs to obtain subscriber information for phone number (417) 228-0055.

7. Ad Hoc Labs responded electronically to the subpoena on November 20, 2020. Information supplied by Ad Hoc Labs indicated that the account associated with the Voice Over Internet Protocol (VoIP) phone number (417) 228-0055 was created on November 5, 2019, and "burned/expired" on September 18, 2020. The account listed phone number as

(417) 827-7535 as the actual phone number behind the burner phone number of (417) 228-0055. TFO Fletcher did research and determined that to register for a “burner” number with Ad Hoc Labs, a subscriber must provide a legitimate phone number.

8. TFO Fletcher obtained a subpoena on December 18, 2020, directed to AT&T for the subscriber information associated with (417) 827-7535. The records provided by AT&T showed that the phone number (417) 827-7535 was registered to Colby FRONTERHOUSE since November 10, 2007. AT&T provided two addresses for Colby FRONTERHOUSE, 2573 South Mumford Avenue, Springfield, Missouri 65809 and 117 West Trail Point Drive, Nixa, Missouri 65714. AT&T provided an email address for Colby FRONTERHOUSE of colbyfront@yahoo.com.

9. On January 6, 2021, TFO Fletcher began reviewing the forensic analysis of John Doe’s cell phone and John Doe’s associated iCloud account. TFO Fletcher located a series of images of a male in underwear, with what appeared to be an erect penis outline showing through the underwear. TFO Fletcher also located an image titled IMG_0466.JPG depicting a male exposing his penis. These images match the content of the text message thread between the suspect and John Doe. The exposed penis image was last modified on September 5, 2020, fitting the timeline of the text message and the content of the text messages between John Doe and the suspect.

10. TFO Fletcher reviewed the conversation that took place between John Doe and the phone number (417) 228-0055, which occurred between September 2, 2020, and September 6, 2020. During the conversation between John Doe and the user of (417) 228-0055, John Doe told the suspect he is 13 years old and the suspect identified himself as a 14 year old

female. The first text message sent by the suspect to John Doe read, “Hey Ryan, was kind of hoping I’d hear from you over the weekend or this week:). I am so glad our paths crossed on Friday because I DEFINITELY had fun at your place:)...I needed to relieve some stress, and that definitely did the trick! Anyway, would love to hang out again sometime soon if you’d want!...so let me know if you’re interested:). Hope to talk to you soon!! –Lacey.” After John Doe clarifies that he is not “Ryan”, the text message conversation continued on for approximately four days with the suspect asking and encouraging John Doe to send the suspect sexually explicit images, having sexually explicit conversations with John Doe, and John Doe sending sexually explicit images to the suspect. At some point, the suspect made specific requests for poses or types of images from John Doe. During the text conversation, the suspect sent John Doe multiple images of a female who appeared to be approximately 14 years old, some of which were in bathing suits or underwear. The suspect appeared to entice John Doe into sending additional images of himself by promising to send John Doe additional images of the female.

11. TFO Fletcher was able to determine that Colby FRONTERHOUSE was residing at 2573 South Mumford Avenue, Springfield, Missouri 65809, and obtained a federal search warrant signed by Chief Magistrate Judge David P. Rush for this residence on January 21, 2021. The federal search warrant was served on the residence on January 26, 2021, by Homeland Security Investigations.

12. During the service of the search warrant, TFO Fletcher contacted FRONTERHOUSE at the residence. In FRONTERHOUSE’s right front pants pocket was an Apple iPhone XS (Serial Number G0NXT19YKPFT) cell phone, which was seized by TFO Fletcher.

13. On January 27, 2021, HSI TFO Larry Roller, a certified forensic analyst, was able to perform a partial extraction of the iPhone seized from FRONTERHOUSE's person. In the information provided to TFO Roller from the iPhone extraction, the iPhone was utilizing the phone number (417) 827-7535. The email address colbyfront@yahoo.com was found as having been used on the iPhone and was the email address associated with the iCloud account on the iPhone.

14. Recovered in the partial extraction of the iPhone collected from FRONTERHOUSE were 16 connection logs to the Burner application server, showing this iPhone had connected to the servers owned and managed by Ad Hoc Labs Inc. Burner application. One of these connection logs showed FRONTERHOUSE's iPhone had connected to the Burner application servers on September 4, 2020, which was during the time frame when the text message conversation occurred between John Doe and the Burner application VoIP phone number (417) 228-0055.

15. FRONTERHOUSE was employed as an Assistant Principal at Nixa Junior High School in Nixa, Missouri, at the time of the text message conversations with John Doe. On January 27, 2021, TFO Fletcher made contact with the administration at Nixa Junior High School, including Dr. Jared Webster, the school principal. Dr. Webster checked the school records database that contained student information and confirmed that John Doe's cell phone number was present in the database and that FRONTERHOUSE would have had access to that information.


16. Based on his training and experience, TFO Fletcher knows that all Apple iPhones are manufactured, in whole or components, outside of the State of Missouri.

17. Based on the facts set forth in this affidavit, and my training and experience, I believe that on or between September 2, 2020, and September 6, 2020, in the Western District of Missouri, Colby FRONTERHOUSE, did employ, use, persuade, induce, entice, and coerce a minor, John Doe (DOB **/**/2006), to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

Further your affiant sayeth not.


Joseph Fletcher
Task Force Officer
Homeland Security Investigations

Sworn to and subscribed to before me in my presence via telephone on the 27th day of January, 2021.


HONORABLE DAVID P. RUSH
Chief United States Magistrate Judge
Western District of Missouri